

PLEASE TAKE NOTICE THAT, Defendant S.C. Johnson & Son, Inc. (“SC Johnson”) will move this Court, before the Honorable Ronnie Abrams, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York, on a date and at a time to be designated by the Court, for an order dismissing Plaintiffs Carmen Rivera, Letisha Williams, Rosemary Vavitsas, and Lisa Mack’s First Amended Complaint in its entirety pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), and for such other and further relief as the Court may deem just. In support of this motion, SC Johnson submits the attached Memorandum of Law, Request for Judicial Notice, and supporting declaration of David F. McDowell.

Dated: Los Angeles, California
November 13, 2020

Respectfully submitted,

MORRISON & FOERSTER LLP

By: /s/ David F. McDowell
David F. McDowell

Attorneys for Defendant
S.C. JOHNSON & SON, INC.
707 Wilshire Boulevard, Suite 6000
Los Angeles, CA 90017-3543
213.892.5200